

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RONALD FORGUE

Plaintiff,

v.

CITY OF CHICAGO, et. al.

Defendants.

Case No.: 15-cv-8385

Hon. Charles Norgle

**MOTION TO DISMISS DONALD J. O'NEILL, GARRY MCCARTHY, JUAN RIVERA,
AND EDDIE WELCH III AS DEFENDANTS [AGREED]**

NOW COMES the Plaintiff, RONALD FORGUE, by and through his attorneys, Mary J. Grieb and the Shiller Preyar Law Offices, pursuant to Fed.R.Civ.P.41(a)(2), with the instant motion to dismiss Defendants Donald J. O'Neill, Garry McCarthy, Juan Rivera, and Eddie Welch III with prejudice and with each side bearing their own costs and attorneys' fees and states as follows:

1. Plaintiff respectfully requests that this Court dismiss Defendants Donald J. O'Neill, Garry McCarthy, Juan Rivera, and Eddie Welch III with prejudice and with each side bearing their own costs and attorneys' fees pursuant to Fed.R.Civ.P.41(a)(2).
2. The case remains pending against Defendant City of Chicago. The parties anticipate finalizing settlement with Defendant City of Chicago after the instant motion is granted.
3. On November 9, 2018, Plaintiff, by counsel, conferred with Elizabeth Babbitt, counsel for Defendants O'Neill, McCarthy, Rivera, and Welch, and the individual Defendants agree to the instant motion and terms of dismissal.
4. A copy of a proposed order reflecting the dismissal of the individual defendants has been sent to this Court's proposed order inbox at the same time as filing the instant motion.

WHEREFORE, Plaintiff hereby requests that this Court dismiss Defendants Donald J. O'Neill, Garry McCarthy, Juan Rivera, and Eddie Welch III with prejudice and with each side bearing their own costs and attorneys' fees.

s/Mary J. Grieb
Attorney for Plaintiff
Mary J. Grieb
The Shiller Preyar Law Offices
601 S. California Ave.
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CERTIFICATE OF SERVICE

I, Mary J. Grieb, hereby certify that a copy of the foregoing was served upon all opposing counsel via the CM/ECF email system.

s/Mary J. Grieb
Mary J. Grieb
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